

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen M. Williams,
Magistrate Judge

Honorable Thomas Vanaskie
(Ret.), Special Discovery
Master

**THE ZHP PARTIES' CROSS MOTION FOR PROTECTIVE ORDER
PRECLUDING THE PRODUCTION OF DOCUMENTS WITHHELD AS
CHINESE STATE SECRETS**

Zhejiang Huahai Pharmaceutical Co., Ltd, Huahai US, Inc., Princeton
Pharmaceutical Inc., and Solco Healthcare U.S., LLC (collectively the “ZHP
Parties”), file this Motion for Protective Order and aver as follows:

1. In support of the instant motion, the ZHP Parties will rely on their
accompanying brief, exhibits, and proposed order.

May 21, 2021

Respectfully submitted,

By: /s/ Seth A. Goldberg

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